

LEVIN-EPSTEIN & ASSOCIATES, P.C.

420 Lexington Avenue • Suite 2458 • New York, New York 10170
T: 212.792-0046 • E: Joshua@levinepstein.com

July 24, 2025

Via Electronic Filing

The Hon. P. Kevin Castel, U.S.D.J.
U.S. District Court, Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Schottenstein et al v. Capla et al*
Case No.: 1:22-cv-10883-PKC

Dear Judge Castel:

This law firm represents Defendants Edward L. Capla and Yolanda Capla (together, the “Defendants”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Motion Practice Rule 1(C), this letter respectfully serves to request an extension of time for all parties to respond to the July 25, 2025 pre-motion letter filed by Plaintiffs Dr. Douglas Schottenstein and Schottenstein Pain and Neuro, PLLC (d/b/a NY Spine Medicine) (together, the “Plaintiffs”) [Dckt. No. 159] (the “Pre-Motion Letter”), from August 7, 2025 to, through and including August 14, 2025.

This is the second request of its kind, and is made on consent of counsel for Plaintiffs, as well as non-party respondent Dr. Bradley Wasserman (“Wasserman”).

The basis of this request is that the parties still require additional time to meet-and-confer, and address the issues raised in the Pre-Motion Letter, to possibly avoid further Court intervention.

In light of the foregoing, it is respectfully requested that the parties’ time, and Wasserman’s time, to respond to the Pre-Motion Letter be extended to, through and including August 14, 2025.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Joshua D. Levin-Epstein

Joshua D. Levin-Epstein, Esq.
420 Lexington Avenue, Suite 2458
New York, NY 10170
Tel. No.: (212) 792-0046
Email: Joshua@levinepstein.com
Attorneys for Defendants

Application GRANTED. Time to respond extended
to August 14, 2025.

SO ORDERED.

Dated: 8/7/25


P. Kevin Castel
United States District Judge

Cc: All counsel-of-record, via ECF.